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5 Attorney for Plaintiff
6 BIOQ PHARMA INCORPORATED

7 UNITED STATES DISTRICT COURT
8
NORTHERN DISTRICT OF CALIFORNIA

10 BIOQ PHARMA INCORPORATED,
11 Plaintiff,

12 vs.

13 STAR CAPITAL INVESTMENTS LLC, a/k/a
14 STAR CAPITAL LLC & STAR CAPITAL;
15 GS HOLDING & GURMEET SINGH
BHAMRAH,

16 Defendants.

17 Case No.: 3:23-cv-00399-WHO

18 STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME FOR
PLAINTIFF TO FILE A REPLY BRIEF
PURSUANT TO CIV. LOCAL RULES 6-2
AND 7-12

19 Date: June 7, 2023

Time: 2:00 p.m.

Place: Courtroom 2, 17th Floor

20 **STIPULATION**

21 Plaintiff BioQ Pharma Incorporated (“Plaintiff”) and defendants GS Holding and Star
Capital Investment, LLC (“Defendants”) hereby stipulate and agree that Plaintiff’s deadline to file
22 and serve its Reply to Defendants’ Opposition (Doc. 20) to Plaintiff’s Motion for Entry of Default
23 (Doc. 16) is hereby extended to through and including May 11, 2023.

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**STIPULATION AND
PROPOSED ORDER**

1 DATED: May 3, 2023

CLAASSEN MARRS, P.C.

2 /s/ John S. Claassen, Esq.

3 By: _____

4 John S. Claassen, Esq.
5 Attorney of Plaintiff
6 BIOQ PHARMA INCORPORATED

7 DATED: May 2, 2023

8 DENTONS US LLP

9 /s/ Seena Forouzan

10 By: _____

11 SEENA FOROUZAN (SBN 317777)
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13 ANDREW AZARMI (SBN 241407)
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15 Attorneys for Defendants
16 STAR CAPITAL INVESTMENTS, LLC
17 GS HOLDING

18 **ORDER**

19 DATED: May 4, 2023

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21 HON. WILLIAM H. ORRICK
22 U.S. DISTRICT JUDGE
23 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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DECLARATION OF JOHN S. CLAASSEN, ESQ.

I, John Claassen, declare:

1. I am counsel of record of plaintiff BioQ Pharma, Inc. I submit this declaration in support of the above Stipulation Extending Time for Plaintiff to File its Reply to the defendants' Opposition to my client's Motion for the Entry of Default. Unless otherwise indicated, I have personal knowledge of the facts set forth herein and could and would testify competently thereto if asked to do so.

2. My client's Motion was originally filed with a hearing date of March 27. The Court continued it to May 10. The defendants' filed their Opposition last week, on Thursday, April 27. At the same time, they filed a Motion for Relief from Default, which was set for June 7. The Motion is factually related. The Court then continued my client's motion to the same date.

3. I believe that it is reasonably necessary for my client to have additional time to file its Reply in light of the circumstances of the case. No Opposition was received until last Thursday. Under Civil Local Rule 7-3, a Reply likely would have been due in April given the original filing date. The new proposed deadline is the apparent deadline for defendants to file their Reply to their Motion for Relief from Default.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this May 3, 2023.

/s/ John S. Claassen, Esq.

John S. Claassen, Esq.